

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

VENTURE GLOBAL ENGINEERING,
LLC, a Michigan limited liability company,
and THE LARRY J. WINGET LIVING
TRUST, a trust organized under Michigan law,

Plaintiffs,

v.

SATYAM COMPUTER SERVICES,
LTD. [n/k/a Mahindra Satyam],

Defendant.

Case No. 2:10-cv-15142

Hon. Robert H. Cleland

Mag. J. Michael J. Hluchaniuk

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**DEFENDANT SATYAM COMPUTER SERVICES, LTD.'S
SUPPLEMENTAL RESPONSE TO PLAINTIFFS' "OBJECTION TO
NOTICE OF INTENDED APPOINTMENT OF SPECIAL MASTER"**

Pursuant to the Court's Order of June 6, 2014, Defendant Satyam Computer Services, Ltd. ("Satyam") files this brief Supplemental Response to the Objection to Notice of Intended Appointment of Special Master (the "Objection") by Plaintiffs Venture Global Engineering, LLC and the Larry J. Winget Living Trust (collectively, "Plaintiffs").

As stated in Satyam's initial response, Satyam does not oppose the Court's appointment of Professor Khanna to serve as the Special Master to make a report and recommendations with respect to Satyam's motion to dismiss. Professor Khanna has proven himself an unbiased and qualified Special Master for this Court and there is no valid reason why he should not be appointed here.

Rather than a source of concern, Professor Khanna's familiarity with and involvement in the prior enforcement proceedings will allow him to "get up to speed" more efficiently than another Special Master, who likely will have to spend additional time, at the parties' expense, to understand the lengthy procedural history that has occurred on three continents over an eight-year period. We also note that Professor Khanna is located in the Eastern District of Michigan and the three candidates that Plaintiffs have proposed are not.

Among the candidates suggested by Plaintiffs, neither Professor Manoj Mate nor Vinita Bahri-Mehra appear to have any experience or expertise that is pertinent to the issues raised by Satyam's motion to dismiss or Plaintiffs' opposition – either

with respect to whether the Indian High Court's judgment is final under Indian law, or with respect to the issues of federal and Michigan law – on which the Special Master will have to make a report and recommendations. To the extent the Court is inclined not to appoint Professor Khanna and plans to select an alternate candidate from one of Plaintiffs' proposed candidates, Satyam does not have an objection to the appointment of Professor Ved Nanda.

Dated: June 17, 2014

/s/ Bradley I. Ruskin

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CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2014, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to all ECF participants.

/s/ Jordan B. Leader

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